

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

RICHARD TYLER HUNSINGER,
Defendant.

CRIMINAL ACTION NO.:
1:20-cr-00466-AT-AJB

CONSENT MOTION TO CONTINUE PRETRIAL CONFERENCE

COMES NOW Defendant, RICHARD TYLER HUNSINGER, by and through undersigned counsel, and hereby moves this Court to grant a continuance of the Pretrial Conference in the above-styled case, and shows this Honorable Court the following:

1.

The case is scheduled for a Pretrial Conference on January 7, 2021 at 10 a.m.

2.

The Government produced discovery over the holidays on a one terabyte drive. The Government is in the process of determining whether there is more discovery to be produced. Regardless of whether there is more discovery, more time is required to review that which has been produced. Consequently, counsel for Mr. Hunsinger requests a 30-day extension of the pretrial conference.

3.

The Government, through AUSA Ryan Buchanan, consents to this motion. This motion is not made for the purposes of delay, but to ensure that the Defendant will be given adequate opportunity to fully examine the discovery.

WHEREFORE, for the reasons stated herein, the Defendant respectfully requests that this Honorable Court grant this motion and reschedule the Pretrial Conference in the above-styled case.

Dated: This 7th day of January, 2021.

Respectfully Submitted,
/s/ John Lovell
John Lovell
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ORDER

It appears to the Court that counsel for the defendant Richard Tyler Hunsinger requires an extension of time for the Pretrial Conference in the instant case.

Accordingly, for good cause shown it is HEREBY ORDERED that the Pretrial Conference shall be held on _____, 2021 at _____.m.

The delay between the original and rescheduled Pretrial Conferences shall be excluded from Speedy Trial Act calculations because the Court finds that the reason for the delay was for good cause and the interests of justice in granting the continuance outweigh the public's and the defendant's rights to a speedy trial. 18 U.S.C. § 3161, *et seq.*

SO ORDERED this ____ day of January 2021.

ALAN J. BAVERMAN
UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE AND COMPLIANCE

This is to certify that a copy of the foregoing document was formatted in Times New Roman 14 pt., in accordance with Local Rule 5.1B, and was electronically filed this day with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all parties of record.

Dated: This 7th day of January, 2021.

/s/ John Lovell
John Lovell
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